IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

GAYLE N. ROBBINS)
Plaintiff,)) Case No. 4:15-CV-1360-HEA
Vs.)))
FORD MOTOR COMPANY)) JURY TRIAL DEMANDED)
Defendant.)

MOTION TO WITHDRAW AS COUNSEL FOR PLAINTIFF AND TO STAY DEADLINES

Pursuant to Federal Rule of Civil Procedure 7(b), and to Missouri Rule of Professional Conduct 4-1.16, Patrick M. Ardis, Kip E. Whittemore and Daniel V. Parish of Wolff Ardis, P.C., and Daniel T DeFeo of DeFeo and Kolker, LLC, move this Court for permission to withdraw their appearances on behalf of the Plaintiff Gayle Robbins (the "Plaintiff"). Plaintiff has been notified of his counsels' intent to withdraw. Good cause exists for filing this motion, because professional considerations require termination of the representation.

Because this matter is set for trial on August 21, 2017, Plaintiff moves this

Court to stay all deadlines to give Plaintiff a reasonable amount of time to find new counsel.

Attached as Exhibit 1 is a proposed Order on the Motion to Withdraw as Counsel for Plaintiff and to Stay Deadlines.

CERTIFICATE OF CONSULTATION

Counsel has consulted with counsel for Ford Motor Company, and Ford has no objection to the withdrawal of Patrick M. Ardis, Kip E. Whittemore and Daniel V. Parish of Wolff Ardis, P.C., and Daniel T DeFeo of DeFeo and Kolker, LLC.

Counsel for Ford does object to a stay of this matter.

Respectfully Submitted,

/s/ Patrick M. Ardis

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I, Patrick M. Ardis, one of the attorneys for the Plaintiff, Gayle N. Robbins, hereby certify that I have this day electronically filed the above and foregoing Motion to Withdraw as Counsel and to Stay Deadlines with the Clerk of the Court using the ECF system which sent notification of such filing to counsel who have electronically registered with the Court:

Patrick M. Ardis Kip E. Whittemore Daniel V. Parish Wolff Ardis, P.C. 5810 Shelby Oaks Drive Memphis, Tennessee 38134

Daniel T. DeFeo DeFeo and Kolker, LLC 924 Main St. Lexington, MO 64067

Rodney E. Loomer Ty Zackery Harden Sherry A. Rozell Turner and Reid 1355 E. Bradford Parkway Suite A Springfield, MO 65804

DATED, this the 5th day of July, 2017.

/s/ Patrick M. Ardis